

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

United States of America,

Plaintiff,

Case No. 23-cr-20253

Honorable Judith E. Levy

vs.

D-8 Maurice Brown-Portwood,

Defendant.

Stipulated Preliminary Order of Forfeiture

The United States of America, by and through its attorney, Jessica A. Nathan, Assistant United States Attorney, and Defendant Deangelo Jackson-Portwood, by and through his attorney, John M. McManus, submit this Stipulated Preliminary Order of Forfeiture for immediate entry, and agree to the following:

Based on the contents of Brown-Portwood's Rule 11 Plea Agreement (ECF No. 123), Brown-Portwood's guilty plea to Count One of the Indictment, a violation of 18 U.S.C. § 1349, this Stipulation, and other information in the record, and pursuant to Fed. R. Crim. P. 32.2, 18 U.S.C. § 981(a)(1)(C) together with 28 U.S.C. § 2461(c), **IT IS HEREBY ORDERED, ADJUDGED, AND DECREED THAT:**

1. Defendant shall forfeit to the United States all right, title and interest he may possess in any and all property, real or personal, which constitutes or is

derived from proceeds traceable to, and which he acquired as a result of, his participation in his offense including, but not limited to:

- \$3,200.00 U.S. Currency from a 2017 Tesla Model X, VIN: 5YJXCDE23HF059189, registered to and in the possession of Deangelo Jackson-Portwood at 22028 Malden Street, Farmington Hills, Michigan;
- \$1,730.00 U.S. Currency from the residence at 17303 Griggs Street, Detroit, Michigan;
- \$3,900.00 in funds from Demand Deposit Account #XXXXXXXXXX0695 in the name of Alexander Enriquez at Bank of America, Grosse Pointe Woods, Michigan;
- \$22,800.00 in funds from Demand Deposit Account #XXXXXXXXXX6046 in the name of Alisa Hughes at Bank of America, Grosse Pointe Woods, Michigan;
- \$600.00 in funds from Demand Deposit Account #XXXXXXXXXX2589 in the name of Alishia Pempleton at Bank of America, Grosse Pointe Woods, Michigan;
- \$15,000.00 in funds from Demand Deposit Account #XXXXXXXXXX1825 in the name of Amy Spence at Bank of America, Grosse Pointe Woods, Michigan;
- \$3.00 in funds from Demand Deposit Account #XXXXXXXXXX7595 in the name of Andrew Daniels at Bank of America, Grosse Pointe Woods, Michigan;
- \$8,000.00 in funds from Demand Deposit Account #XXXXXXXXXX3060 in the name of Andrew George at Bank of America, Grosse Pointe Woods, Michigan;
- \$13,700.00 in funds from Demand Deposit Account #XXXXXXXXXX6899 in the name of Anissa Forbes at Bank of America, Grosse Pointe Woods, Michigan;

- \$18,450.00 in funds from Demand Deposit Account #XXXXXXXXXX6541 in the name of Anne Russo at Bank of America, Grosse Pointe Woods, Michigan;
- \$13.00 in funds from Demand Deposit Account #XXXXXXXXXX9897 in the name of Araceli Thiele at Bank of America, Grosse Pointe Woods, Michigan;
- \$21.32 in funds from Demand Deposit Account #XXXXXXXXXX4661 in the name of Ariana Paulson at Bank of America, Grosse Pointe Woods, Michigan;
- \$5,900.00 in funds from Demand Deposit Account #XXXXXXXXXX7619 in the name of Ashli Ceraolo at Bank of America, Grosse Pointe Woods, Michigan;
- \$0.85 in funds from Demand Deposit Account #XXXXXXXXXX0097 in the name of Atoe M Jackson at Bank of America, Grosse Pointe Woods, Michigan;
- \$15,900.00 in funds from Demand Deposit Account #XXXXXXXXXX3038 in the name of Brandon Ogbodu at Bank of America, Grosse Pointe Woods, Michigan;
- \$15,500.00 in funds from Demand Deposit Account #XXXXXXXXXX8262 in the name of Brent Stoll at Bank of America, Grosse Pointe Woods, Michigan;
- \$21,900.00 in funds from Demand Deposit Account #XXXXXXXXXX7730 in the name of Brittany Bertheat at Bank of America, Grosse Pointe Woods, Michigan;
- \$9,900.00 in funds from Demand Deposit Account #XXXXXXXXXX6384 in the name of Carlie Cantrell at Bank of America, Grosse Pointe Woods, Michigan;
- \$5,500.00 in funds from Demand Deposit Account #XXXXXXXXXX7082 in the name of Casie Mahaley at Bank of America, Grosse Pointe Woods, Michigan;

- \$5,300.00 in funds from Demand Deposit Account #XXXXXXXXXX0102 in the name of Catherine Wei at Bank of America, Grosse Pointe Woods, Michigan;
- \$14,900.00 in funds from Demand Deposit Account #XXXXXXXXXX3963 in the name of Cherina Overton at Bank of America, Grosse Pointe Woods, Michigan;
- \$15,500.00 in funds from Demand Deposit Account #XXXXXXXXXX6684 in the name of Claire Mintich at Bank of America, Grosse Pointe Woods, Michigan;
- \$14,300.00 in funds from Demand Deposit Account #XXXXXXXXXX4726 in the name of Clint Brandon at Bank of America, Grosse Pointe Woods, Michigan;
- \$15,500.00 in funds from Demand Deposit Account #XXXXXXXXXX0640 in the name of Cristina Urbina at Bank of America, Grosse Pointe Woods, Michigan;
- \$18,600.00 in funds from Demand Deposit Account #XXXXXXXXXX4923 in the name of Curtis Bowen at Bank of America, Grosse Pointe Woods, Michigan;
- \$10,700.00 in funds from Demand Deposit Account #XXXXXXXXXX3658 in the name of Dan Tatum at Bank of America, Grosse Pointe Woods, Michigan;
- \$14,300.00 in funds from Demand Deposit Account #XXXXXXXXXX8776 in the name of Dana Green at Bank of America, Grosse Pointe Woods, Michigan;
- \$14,900.00 in funds from Demand Deposit Account #XXXXXXXXXX1347 in the name of David Caplan at Bank of America, Grosse Pointe Woods, Michigan;
- \$5,100.00 in funds from Demand Deposit Account #XXXXXXXXXX9040 in the name of David F Gorgie at Bank of America, Grosse Pointe Woods, Michigan;

- \$13,055.76 in funds from Demand Deposit Account #XXXXXXXXXX6213 in the name of David Gray at Bank of America, Grosse Pointe Woods, Michigan;
- \$22,800.00 in funds from Demand Deposit Account #XXXXXXXXXX9673 in the name of David M Reppond at Bank of America, Grosse Pointe Woods, Michigan;
- \$600.00 in funds from Demand Deposit Account #XXXXXXXXXX7097 in the name of Delia Rodriguez at Bank of America, Grosse Pointe Woods, Michigan;
- \$900.00 in funds from Demand Deposit Account #XXXXXXXXXX4990 in the name of Denise Bozzuto at Bank of America, Grosse Pointe Woods, Michigan;
- \$6.50 in funds from Demand Deposit Account #XXXXXXXXXX9682 in the name of Derrick Brown at Bank of America, Grosse Pointe Woods, Michigan;
- \$6.50 in funds from Demand Deposit Account #XXXXXXXXXX2482 in the name of Diane McCall at Bank of America, Grosse Pointe Woods, Michigan;
- \$3.00 in funds from Demand Deposit Account #XXXXXXXXXX7282 in the name of Donna Kelley at Bank of America, Grosse Pointe Woods, Michigan;
- \$22,800.00 in funds from Demand Deposit Account #XXXXXXXXXX4300 in the name of Donna Mayfield at Bank of America, Grosse Pointe Woods, Michigan;
- \$10,100.00 in funds from Demand Deposit Account #XXXXXXXXXX8919 in the name of Doran Braun at Bank of America, Grosse Pointe Woods, Michigan;
- \$7,100.00 in funds from Demand Deposit Account #XXXXXXXXXX5903 in the name of Edanette Marquez at Bank of America, Grosse Pointe Woods, Michigan;

- \$16,800.00 in funds from Demand Deposit Account #XXXXXXXXXX4709 in the name of Elisa Gary at Bank of America, Grosse Pointe Woods, Michigan;
- \$45.00 in funds from Demand Deposit Account #XXXXXXXXXX3905 in the name of Eugen Ratiu at Bank of America, Grosse Pointe Woods, Michigan;
- \$21,900.00 in funds from Demand Deposit Account #XXXXXXXXXX4465 in the name of Frank Fleming at Bank of America, Grosse Pointe Woods, Michigan;
- \$13,700.00 in funds from Demand Deposit Account #XXXXXXXXXX7248 in the name of George Coffey at Bank of America, Grosse Pointe Woods, Michigan;
- \$21,900.00 in funds from Demand Deposit Account #XXXXXXXXXX4386 in the name of Hamilton Johnson at Bank of America, Grosse Pointe Woods, Michigan;
- \$13.00 in funds from Demand Deposit Account #XXXXXXXXXX5775 in the name of Harriet Landree at Bank of America, Grosse Pointe Woods, Michigan;
- \$3,900.00 in funds from Demand Deposit Account #XXXXXXXXXX7559 in the name of Heather Wiley at Bank of America, Grosse Pointe Woods, Michigan;
- \$10,700.00 in funds from Demand Deposit Account #XXXXXXXXXX0682 in the name of James Williams at Bank of America, Grosse Pointe Woods, Michigan;
- \$600.00 in funds from Demand Deposit Account #XXXXXXXXXX8413 in the name of Jason Baril at Bank of America, Grosse Pointe Woods, Michigan;
- \$16,500.00 in funds from Demand Deposit Account #XXXXXXXXXX8747 in the name of Jayme Williams at Bank of America, Grosse Pointe Woods, Michigan;

- \$3.00 in funds from Demand Deposit Account #XXXXXXXXXX3604 in the name of Jessica Williams at Bank of America, Grosse Pointe Woods, Michigan;
- \$14,300.00 in funds from Demand Deposit Account #XXXXXXXXXX9590 in the name of Jessie McClay at Bank of America, Grosse Pointe Woods, Michigan;
- \$22,800.00 in funds from Demand Deposit Account #XXXXXXXXXX9500 in the name of Jessie Wock at Bank of America, Grosse Pointe Woods, Michigan;
- \$11,500.00 in funds from Demand Deposit Account #XXXXXXXXXX7967 in the name of Joan Gruczkowski at Bank of America, Grosse Pointe Woods, Michigan;
- \$8,500.00 in funds from Demand Deposit Account #XXXXXXXXXX7397 in the name of Joann Estrada at Bank of America, Grosse Pointe Woods, Michigan;
- \$13,700.00 in funds from Demand Deposit Account #XXXXXXXXXX7171 in the name of Joanne Rhiger at Bank of America, Grosse Pointe Woods, Michigan;
- \$22,800.00 in funds from Demand Deposit Account #XXXXXXXXXX6441 in the name of John Davis at Bank of America, Grosse Pointe Woods, Michigan;
- \$900.00 in funds from Demand Deposit Account #XXXXXXXXXX5880 in the name of John Hild at Bank of America, Grosse Pointe Woods, Michigan;
- \$14,900.00 in funds from Demand Deposit Account #XXXXXXXXXX0214 in the name of Jolene Smyers at Bank of America, Grosse Pointe Woods, Michigan;
- \$10.00 in funds from Demand Deposit Account #XXXXXXXXXX6750 in the name of Jonathan D Pacheco at Bank of America, Grosse Pointe Woods, Michigan;

- \$18,600.00 in funds from Demand Deposit Account #XXXXXXXXXX7689 in the name of Joseph Barry-Austin at Bank of America, Grosse Pointe Woods, Michigan;
- \$15,500.00 in funds from Demand Deposit Account #XXXXXXXXXX8413 in the name of Joy M Copeland at Bank of America, Grosse Pointe Woods, Michigan;
- \$11,000.00 in funds from Demand Deposit Account #XXXXXXXXXX3041 in the name of Jurdy Sealey at Bank of America, Grosse Pointe Woods, Michigan;
- \$16,500.00 in funds from Demand Deposit Account #XXXXXXXXXX4730 in the name of Kerry Goforth at Bank of America, Grosse Pointe Woods, Michigan;
- \$3.00 in funds from Demand Deposit Account #XXXXXXXXXX5856 in the name of Kristy Hodges at Bank of America, Grosse Pointe Woods, Michigan;
- \$5,500.00 in funds from Demand Deposit Account #XXXXXXXXXX8397 in the name of Kyal Manzini at Bank of America, Grosse Pointe Woods, Michigan;
- \$16,800.00 in funds from Demand Deposit Account #XXXXXXXXXX4232 in the name of Laurent Michel at Bank of America, Grosse Pointe Woods, Michigan;
- \$11,700.00 in funds from Demand Deposit Account #XXXXXXXXXX6732 in the name of Layton Brush at Bank of America, Grosse Pointe Woods, Michigan;
- \$600.00 in funds from Demand Deposit Account #XXXXXXXXXX6337 in the name of Lee Mickus at Bank of America, Grosse Pointe Woods, Michigan;
- \$15,500.00 in funds from Demand Deposit Account #XXXXXXXXXX0088 in the name of Lindsay Spencer at Bank of America, Grosse Pointe Woods, Michigan;

- \$2,900.00 in funds from Demand Deposit Account #XXXXXXXXXX7862 in the name of Mario Reyes at Bank of America, Grosse Pointe Woods, Michigan;
- \$7,450.00 in funds from Demand Deposit Account #XXXXXXXXXX2727 in the name of Marva Morris at Bank of America, Grosse Pointe Woods, Michigan;
- \$5,800.00 in funds from Demand Deposit Account #XXXXXXXXXX2309 in the name of Mary Harris at Bank of America, Grosse Pointe Woods, Michigan;
- \$17,700.00 in funds from Demand Deposit Account #XXXXXXXXXX8784 in the name of Matt Merrihew at Bank of America, Grosse Pointe Woods, Michigan;
- \$18,600.00 in funds from Demand Deposit Account #XXXXXXXXXX1927 in the name of Matthew Polk at Bank of America, Grosse Pointe Woods, Michigan;
- \$15,511.62 in funds from Demand Deposit Account #XXXXXXXXXX8853 in the name of Maxie Rowell at Bank of America, Grosse Pointe Woods, Michigan;
- \$22.36 in funds from Demand Deposit Account #XXXXXXXXXX3413 in the name of Melinda Greenberg at Bank of America, Grosse Pointe Woods, Michigan;
- \$20,741.02 in funds from Demand Deposit Account #XXXXXXXXXX1455 in the name of Michael Leckron at Bank of America, Grosse Pointe Woods, Michigan;
- \$15,800.00 in funds from Demand Deposit Account #XXXXXXXXXX4655 in the name of Michelle Levy at Bank of America, Grosse Pointe Woods, Michigan;
- \$3.00 in funds from Demand Deposit Account #XXXXXXXXXX0559 in the name of Monica Henriksen at Bank of America, Grosse Pointe Woods, Michigan;

- \$16,500.00 in funds from Demand Deposit Account #XXXXXXXXXX1190 in the name of Nathaniel Everett at Bank of America, Grosse Pointe Woods, Michigan;
- \$24,000.00 in funds from Demand Deposit Account #XXXXXXXXXX6945 in the name of Nicholas Goldberg at Bank of America, Grosse Pointe Woods, Michigan;
- \$15,600.00 in funds from Demand Deposit Account #XXXXXXXXXX2371 in the name of Nick Jody at Bank of America, Grosse Pointe Woods, Michigan;
- \$16,800.00 in funds from Demand Deposit Account #XXXXXXXXXX3419 in the name of Nicole Parry at Bank of America, Grosse Pointe Woods, Michigan;
- \$21,000.00 in funds from Demand Deposit Account #XXXXXXXXXX9837 in the name of Nikki Harvey at Bank of America, Grosse Pointe Woods, Michigan;
- \$8,970.45 in funds from Demand Deposit Account #XXXXXXXXXX8537 in the name of Noe Garcia at Bank of America, Grosse Pointe Woods, Michigan;
- \$17,221.10 in funds from Demand Deposit Account #XXXXXXXXXX2771 in the name of Nunicka Epps at Bank of America, Grosse Pointe Woods, Michigan;
- \$19,800.00 in funds from Demand Deposit Account #XXXXXXXXXX5282 in the name of Patricia Epperson at Bank of America, Grosse Pointe Woods, Michigan;
- \$7,900.00 in funds from Demand Deposit Account #XXXXXXXXXX7932 in the name of Rebekah Anderson at Bank of America, Grosse Pointe Woods, Michigan;
- \$15,500.00 in funds from Demand Deposit Account #XXXXXXXXXX4284 in the name of Robyn Mendez at Bank of America, Grosse Pointe Woods, Michigan;

- \$8,554.67 in funds from Demand Deposit Account #XXXXXXXXXX9081 in the name of Ronald Cockerill at Bank of America, Grosse Pointe Woods, Michigan;
- \$10,700.00 in funds from Demand Deposit Account #XXXXXXXXXX2602 in the name of Ronald Schoelkopf at Bank of America, Grosse Pointe Woods, Michigan;
- \$14,900.00 in funds from Demand Deposit Account #XXXXXXXXXX6683 in the name of Sabrina Irvin at Bank of America, Grosse Pointe Woods, Michigan;
- \$13.00 in funds from Demand Deposit Account #XXXXXXXXXX5624 in the name of Sean Menza at Bank of America, Grosse Pointe Woods, Michigan;
- \$18,900.00 in funds from Demand Deposit Account #XXXXXXXXXX3329 in the name of Shannon Amerson at Bank of America, Grosse Pointe Woods, Michigan;
- \$34.00 in funds from Demand Deposit Account #XXXXXXXXXX5178 in the name of Shannon E Hill at Bank of America, Grosse Pointe Woods, Michigan;
- \$18,450.00 in funds from Demand Deposit Account #XXXXXXXXXX4171 in the name of Shannon Hughes at Bank of America, Grosse Pointe Woods, Michigan;
- \$7,100.00 in funds from Demand Deposit Account #XXXXXXXXXX2487 in the name of Shonda Walker at Bank of America, Grosse Pointe Woods, Michigan;
- \$21,900.00 in funds from Demand Deposit Account #XXXXXXXXXX2678 in the name of Stephen Black at Bank of America, Grosse Pointe Woods, Michigan;
- \$11,061.77 in funds from Demand Deposit Account #XXXXXXXXXX2745 in the name of Steven Nichols at Bank of America, Grosse Pointe Woods, Michigan;

- \$16,500.00 in funds from Demand Deposit Account #XXXXXXXXXX5328 in the name of Tameika McLean at Bank of America, Grosse Pointe Woods, Michigan;
- \$15,500.00 in funds from Demand Deposit Account #XXXXXXXXXX8870 in the name of Tamika A Williams at Bank of America, Grosse Pointe Woods, Michigan;
- \$18,000.00 in funds from Demand Deposit Account #XXXXXXXXXX7028 in the name of Tatyanna Philips at Bank of America, Grosse Pointe Woods, Michigan;
- \$7,100.00 in funds from Demand Deposit Account #XXXXXXXXXX5719 in the name of Tayler Briggs at Bank of America, Grosse Pointe Woods, Michigan;
- \$2,850.97 in funds from Demand Deposit Account #XXXXXXXXXX4395 in the name of Terra Stock at Bank of America, Grosse Pointe Woods, Michigan;
- \$16,800.00 in funds from Demand Deposit Account #XXXXXXXXXX1820 in the name of Thomas Straus at Bank of America, Grosse Pointe Woods, Michigan;
- \$13.00 in funds from Demand Deposit Account #XXXXXXXXXX8067 in the name of Tiffany Jaquez at Bank of America, Grosse Pointe Woods, Michigan;
- \$3.00 in funds from Demand Deposit Account #XXXXXXXXXX1919 in the name of Todd Daviso at Bank of America, Grosse Pointe Woods, Michigan;
- \$16,800.00 in funds from Demand Deposit Account #XXXXXXXXXX1899 in the name of Tracey Shipman at Bank of America, Grosse Pointe Woods, Michigan;
- \$5,900.00 in funds from Demand Deposit Account #XXXXXXXXXX4699 in the name of Tracy Silvestri at Bank of America, Grosse Pointe Woods, Michigan;

- \$10,100.00 in funds from Demand Deposit Account #XXXXXXXXXX2986 in the name of Travis Fagala at Bank of America, Grosse Pointe Woods, Michigan;
- \$600.00 in funds from Demand Deposit Account #XXXXXXXXXX8101 in the name of Trey Ormond at Bank of America, Grosse Pointe Woods, Michigan;
- \$15,500.00 in funds from Demand Deposit Account #XXXXXXXXXX8942 in the name of Tyler Tipps at Bank of America, Grosse Pointe Woods, Michigan;
- \$1,050.00 in funds from Demand Deposit Account #XXXXXXXXXX9627 in the name of Victor A Soto at Bank of America, Grosse Pointe Woods, Michigan;
- \$3.00 in funds from Demand Deposit Account #XXXXXXXXXX2419 in the name of Walter Jahn at Bank of America, Grosse Pointe Woods, Michigan;
- \$3.14 in funds from Demand Deposit Account #XXXXXXXXXX7332 in the name of William Roper at Bank of America, Grosse Pointe Woods, Michigan;
- \$14,300.00 in funds from Demand Deposit Account #XXXXXXXXXX8264 in the name of William Turner at Bank of America, Grosse Pointe Woods, Michigan; and
- \$9,857.60 in funds from Demand Deposit Account #XXXXXXXXXX3214 in the name of Yabdiel Martinez at Bank of America, Grosse Pointe Woods, Michigan

(collectively referred to hereinafter as the “Subject Property”), as proceeds of his violation of 18 U.S.C. § 1349. As proceeds of the Defendant’s violation of 18 U.S.C. § 1349, the Subject Property is subject to forfeiture under 18

U.S.C. § 981(a)(1)(C) together with 28 U.S.C. § 2461(c), and the requisite nexus exists between the Subject Property and the offense of conviction.

2. The Subject Property **IS HEREBY FORFEITED** to the United States under 18 U.S.C. § 981(a)(1)(C) together with 28 U.S.C. § 2461(c) for disposition according to law, and any right, title, and interest of the Defendant, and any right, title, and interest that his heirs, successors, or assigns have, or may have, in the Subject Property is **HEREBY AND FOREVER EXTINGUISHED**.

3. The Court **ENTERS** a forfeiture money judgment in the amount of **Six Hundred Thirty-Nine Thousand Three Hundred and Sixty Dollars and 00/100 (\$639,360.00)** against the Defendant in favor of the United States which represents the total amount of proceeds that the Defendant personally obtained as described in the factual basis of the Rule 11 Plea Agreement. *See* ECF No. 123. The Parties have agreed the forfeiture money judgment shall be reduced by the net proceeds forfeited to the United States from the Subject Property.

4. If the Defendant does not pay the forfeiture money judgment, the United States may move to satisfy the forfeiture money judgment with any assets the Defendant has now or may later acquire. The Defendant's assets may be forfeited as substitute assets under 21 U.S.C. § 853(p)(2). The United

States is permitted to undertake whatever discovery is necessary to identify, locate, or dispose of substitute assets under Fed. R. Crim. P. 32.2(b) and to otherwise collect on and enforce the money judgment under the Federal Rules of Civil Procedure.

5. Pursuant to Fed. R. Crim. P. 32.2(b)(4)(A), this Stipulated Preliminary Order of Forfeiture shall become final and effective as to the Defendant at the time it is entered by the Court and shall be made a part of the Defendant's sentence and included in his Judgment, but remains preliminary as to third parties until the ancillary proceedings, if any, are concluded under Rule 32.2(c).

6. The forfeiture of the Subject Property shall also be made part of the Defendant's sentence and included in his Judgment.

7. Upon entry of this Order, the United States is authorized to begin proceedings consistent with the applicable statutory requirements pertaining to ancillary hearings and the rights of any third parties.

8. Pursuant to 21 U.S.C. § 853(n), Fed. R. Crim. P. 32.2, and other applicable rules, the United States shall publish notice of this Stipulated Preliminary Order of Forfeiture and of its intent to dispose of the Subject Property on www.forfeiture.gov, for at least thirty (30) consecutive days. The United States may also, to the extent practicable, provide direct written notice

to any person or entity known to have an alleged interest in the Subject Property. The aforementioned notice shall direct that any person, other than Defendant, asserting a legal interest in the Subject Property must file a petition with the Court within thirty (30) days of the final date of publication of notice or within thirty (30) days of receipt of actual notice, whichever is earlier. The petition shall be for a hearing before the Court alone, without a jury and in accordance with 21 U.S.C. § 853(n), to adjudicate the validity of the petitioner's alleged interest in the Subject Property. Any petition filed by a third party asserting an interest in the Subject Property must be signed by the petitioner under penalty of perjury and must set forth the nature and extent of the petitioner's alleged right, title or interest in the Subject Property, the time and circumstances of the petitioner's acquisition of the right, title, or interest in the Subject Property, any additional facts supporting the petitioner's claim, and the relief sought.

9. After the disposition of any motion filed under Fed. R. Crim. P. 32.2(c)(1)(A) and before a hearing on any ancillary petition, the United States may conduct discovery in accordance with the Federal Rules of Civil Procedure upon a showing that such discovery is necessary or desirable to resolve factual issues in the ancillary proceeding of one or more orders of

forfeiture and agrees to sign such order, indicating that he consents to its entry if requested to do by the Government.

10. If no third party files a timely petition before the expiration of the period provided in 21 U.S.C. § 853(n)(2), then this Stipulated Preliminary Order of Forfeiture shall become the Final Order of Forfeiture and the United States shall have clear title to the Subject Property as provided in 21 U.S.C. § 853(n)(7) and Fed. R. Crim. P. 32.2(c)(2); further, the United States shall be authorized to dispose of the Subject Property as prescribed by law.

11. If a third party files a petition for ancillary hearing for the Subject Property, the Court shall enter an Amended and/or Final Order of Forfeiture that addresses the disposition of the third-party petition as provided under Fed. R. Crim. P. 32.2(c)(2).

12. The provisions of this Order will survive the Defendant, notwithstanding the abatement of any underlying criminal conviction after the entry of this Order. The forfeitability of any particular property pursuant to this Order shall be determined as if the Defendant had survived, and that determination shall be binding upon the Defendant's heirs, successors, and assigns until the forfeiture money judgment amount is collected in full.

13. This Court shall retain jurisdiction to enforce this Order, and to amend it as necessary, pursuant to Fed. R. Crim. P. 32.2.

Approved as to form and substance:

Julie A. Beck
Acting United States Attorney

s/Kelly Fasbinder
KELLY FASBINDER
(P80109)
Assistant United States Attorney
211 W. Fort Street, Ste. 2001
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(313) 226-6397
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Dated: March 11, 2025

s/ John McManus (with consent)
John M. McManus (P44102)
Attorney for Maurice Brown-Portwood
McManus Law
17 W. Fourth St., Ste. 201
Royal Oak, MI 48067
(248) 268-8989
jmcmanus@vgpclaw.com

Dated: March 11, 2025

IT IS SO ORDERED.

Date: March 11, 2025

s/Judith E. Levy
Honorable Judith E. Levy
United States District Judge